

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

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HEM & THREAD, INC., a	)	
California corporation; HYUN	)	
KIM, an individual,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Case No.:
	)	2:19-CV-00283-CBM-AFM
WHOLESALEFASHIONSQUARE.COM,	)	
INC., a California	)	
corporation; DOWNTOWN 11TH,	)	
INC., a California	)	
corporation; MIN LEE,	)	
individually dba ROUSSEAU;	)	
ANDREW LEE, individually dba	)	
BOSWELL FASHION; and DOES 1	)	
through 10,	)	
	)	
Defendants.	)	

DEPOSITION OF MICHAEL KREMERMANN

Los Angeles, California

Monday, August 31, 2020

Reported by:  
Kathy E. Mannlein, CSR No. 13153  
Job NO. 54641

MICHAEL KREMERMAN

August 31, 2020

1 UNITED STATES DISTRICT COURT

2 CENTRAL DISTRICT OF CALIFORNIA

3

4 HEM & THREAD, INC., a )

California corporation; HYUN )

5 KIM, an individual, )

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6 Plaintiffs, )

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7 vs. ) Case No.:  
) 2:19-CV-00283-CBM-AFM

8 WHOLESaleFASHIONSQUARE.COM, )

INC., a California )

9 corporation; DOWNTOWN 11TH, )

INC., a California )

10 corporation; MIN LEE, )

individually dba ROUSSEAU; )

11 ANDREW LEE, individually dba )

BOSWELL FASHION; and DOES 1 )

12 through 10, )

)

13 Defendants. )

14

15

16

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18

19

20 The deposition of MICHAEL KREMERMAN, taken on

21 behalf of the Plaintiffs, at a remote location,

22 commencing at 10:07 a.m. and ending at 5:24 p.m., on

23 Monday, August 31, 2020, before Kathy Mannlein, a

24 Certified Shorthand Reporter in the State of California,

25 License No. 13153.

MICHAEL KREMERMAN

August 31, 2020

1 APPEARANCES OF COUNSEL:

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MICHAEL KREMERMAN

August 31, 2020

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1     **make it easier for me to understand the question?**

2           Q.   Sure.   First of all, let me break it down one by  
3     one.

4           Who does Sky Ocean do as a company based on your  
5     understanding?

6           **A.   I don't know.**

7           Q.   So you have no idea what Sky Ocean does?

8           **A.   No.**

9           Q.   Do you know where the company is located?

10          **A.   I think I went to their warehouse, but I'm not**  
11     **sure.**

12          Q.   Do you know when you went to the warehouse?

13          **A.   I don't recall.**

14          Q.   Do you recall at least a year?

15          **A.   What's the year -- what's this court case?   What**  
16     **year is this?**

17          Q.   This was filed in 2019.

18          **A.   This case was filed -- so it's previous to that.**

19          Q.   So would you say 2017 is when you visited them?

20          **A.   I really don't recall.**

21          Q.   2018?

22          **A.   Again, I don't remember.**

23          Q.   Do you recall why you visited their warehouse?

24          **A.   I went to see the -- the goods that I was**  
25     **offered.**

1 Q. When you say the goods that you were offered,  
2 can you please explain what you mean by that?

3 A. I was offered to buy goods and I went -- I drove  
4 to their warehouse to see the goods, to expect that they  
5 exist, and that it looked okay. That's what I saw.

6 Q. What goods are you talking about?

7 A. The -- the goods that are in this case.

8 Q. The garments?

9 A. Yes. Yeah, garment -- the garments that we're  
10 talking about right now.

11 Q. Do you recall them being referred to as Sherpa  
12 jackets?

13 A. That's a phrase that people use, yes.

14 Q. And in terms of referring to this particular  
15 clinical goods, in terms of how you referenced it, it  
16 means Sherpa jackets; correct?

17 A. Yes.

18 Q. At least on your understanding, and your  
19 recollection, you don't recall ever working for  
20 Sky Ocean; correct?

21 A. No.

22 Q. Do you recall WFS ever working for Sky Ocean?

23 A. I don't recall.

24 Q. Do you recall ever working with Sky Ocean at any  
25 time?



MICHAEL KREMERMAN

August 31, 2020

1 State of California )

2 County of LOS ANGELES )

3

4 Deponent's Declaration

5

6

7

8 I, MICHAEL KREMERMAN, do hereby certify under  
9 penalty of perjury that I have read the foregoing  
10 transcript of my deposition taken on August 31, 2020;  
11 that I have made such corrections as appear noted on the  
12 Deposition Errata Page, attached hereto, signed by me;  
13 that my testimony as contained herein, as corrected, is  
14 true and correct.

15

16 Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2020,  
17 at \_\_\_\_\_, California.

18

19

20

21 \_\_\_\_\_  
MICHAEL KREMERMAN

22

23

24

25

MICHAEL KREMERMAN

August 31, 2020

1 State of California )

2 County of LOS ANGELES )

3

4 I, Kathy Mannlein, Certified Shorthand Reporter,  
5 do hereby certify:

6 That prior to being examined, the witness in the  
7 foregoing proceeding was by me duly sworn to testify to  
8 the truth, the whole truth, and nothing but the truth;

9 That said proceedings were taken before me at the  
10 time and place therein set forth and were taken down by  
11 me in shorthand and thereafter transcribed into  
12 typewriting under my direction and supervision;

13 I further certify that I am neither counsel for,  
14 nor related to, any parties to said proceedings, nor in  
15 anywise interested in the outcome thereof.

16 In witness whereof, I have hereunto subscribed my  
17 name.

18

19 Dated: September 14, 2020

20

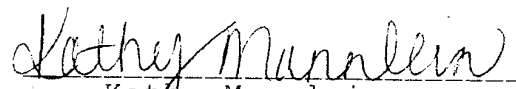
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Kathy Mannlein  
CSR No. 13153

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

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HEM & THREAD, INC., a	)	
California corporation; HYUN	)	
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corporation; DOWNTOWN 11TH,	)	
INC., a California	)	
corporation; MIN LEE,	)	
individually dba ROUSSEAU;	)	
ANDREW LEE, individually dba	)	Job No. 54815
BOSWELL FASHION; and DOES 1	)	
through 10,	)	
	)	
Defendants.	)	

PMK OF WHOLESALEFASHIONSQUARE.COM, INC.

DEPOSITION OF MICHAEL KREMERMAN

VOLUME I

Los Angeles, California

Friday, September 4, 2020

MICHAEL KREMERMAN

September 04, 2020

1 UNITED STATES DISTRICT COURT

2 CENTRAL DISTRICT OF CALIFORNIA

3

4 HEM & THREAD, INC., a )

California corporation; HYUN )

5 KIM, an individual, )

)

6 Plaintiffs, )

)

7 vs. ) Case No.:

) 2:19-CV-00283-CBM-AFM

8 WHOLESALFASHIONSQUARE.COM, )

INC., a California )

9 corporation; DOWNTOWN 11TH, )

INC., a California )

10 corporation; MIN LEE, )

individually dba ROUSSEAU; )

11 ANDREW LEE, individually dba )

BOSWELL FASHION; and DOES 1 )

12 through 10, )

)

13 Defendants. )

14

15

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17

18

19

20 The deposition of MICHAEL KREMERMAN, VOLUME I,

21 taken on behalf of the Plaintiffs, at a remote

22 location, commencing at 2:33 p.m. and ending at 5:01

23 p.m., on Friday, September 4, 2020, before Kathy

24 Mannlein, a Certified Shorthand Reporter in the State

25 of California, License No. 13153.

MICHAEL KREMERMAN

September 04, 2020

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12 THE WAGNER FIRM

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21 THE LAW OFFICES OF FANG CHEN

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MICHAEL KREMERMAN

September 04, 2020

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MICHAEL KREMERMAN

September 04, 2020

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MICHAEL KREMERMAN

September 04, 2020

1 MR. WAGNER: To his knowledge.

2 MR. KIM: Yes. Thank you for that  
3 clarification.

4 **THE WITNESS: Do I remember what it is? No.**

5 BY MR. KIM:

6 Q. I want you to take a look at Exhibit 2.

7 MR. KIM: Ania, can you post it, please, on  
8 share screen.

9 THE VIDEOGRAPHER: Okay. There it is.

10 MR. KIM: Thank you.

11 THE VIDEOGRAPHER: And it is also in the chat.

12 MR. KIM: Great.

13 BY MR. KIM:

14 Q. Mr. Kremerman, while you are searching for the  
15 document, I'm going to explain for the record, that  
16 there is a document that is being shared via share  
17 screen through Zoom that is titled "Complaint For,  
18 Number One, Copyright Infringement; Two, Vicarious  
19 Copyright Infringement; Three, Contributory Copyright  
20 Infringement, And Demand For Jury Trial."

21 And it says Jitrade, Inc., a California  
22 Corporation, Plaintiff, versus  
23 WholesaleFashionSquare.com, Inc., and Does 1 through  
24 10, inclusive, Defendants.

25 MR. KIM: I'm going to be marking this as



1 Exhibit 2, for the record.

2 (Exhibit 2 marked.)

3 BY MR. KIM:

4 Q. Mr. Kremerman, do you see this document that  
5 has been marked as Exhibit 2?

6 MR. WAGNER: Objection. I think it's beyond  
7 the scope of the 30(b)(6) notice.

8 MR. KIM: You may respond.

9 **THE WITNESS: I don't remember seeing this**  
10 **document. But maybe I did. I don't know.**

11 MR. WAGNER: He's asking if you see it right  
12 now.

13 **THE WITNESS: Oh, do I see it right now? Yeah,**  
14 **I see a document.**

15 BY MR. KIM:

16 Q. Do you recall seeing this or receiving this  
17 document that has been marked as Exhibit 2?

18 **A. I don't recall.**

19 Q. Do you recall ever getting sued by a company  
20 called Jitrade, Inc.?

21 **A. I don't recall.**

22 Q. Do you recall what this case was about?

23 **A. No, I do not. I don't recall.**

24 MR. WAGNER: Objection to this whole line.  
25 It's beyond the scope.

1 BY MR. KIM:

2 Q. Are you familiar with a company called Jitrade,  
3 Inc.?

4 A. No.

5 Q. Have you ever heard of a company called  
6 Jitrade, Inc.?

7 A. I don't recall. Maybe I did, but I don't  
8 recall.

9 Q. The name WholesaleFashionSquare.com, Inc., that  
10 is the name of your company; correct?

11 A. Correct.

12 Q. Are you aware of any other company that is  
13 referred to as WholesaleFashionSquare.com, Inc.,  
14 besides yours?

15 A. No.

16 Q. Do you recall what happened with this lawsuit  
17 that was filed or served by Jitrade, Inc. against  
18 Wholesale Fashion Square?

19 A. No.

20 Q. Now, I want you to look at Exhibit 3.

21 MR. KIM: While you're looking for this  
22 document, for the record, I'm going to be marking as  
23 Exhibit 3 a document that is titled "Plaintiff's  
24 Complaint For, Number One, Copyright Infringement; Two,  
25 Vicarious And/Or Contributory Copyright Infringement.

MICHAEL KREMERMAN

September 04, 2020

1 (Exhibit 3 marked.)

2 MR. WAGNER: Object to the entire scope as  
3 beyond the -- this entire line as beyond the scope of  
4 the 30(b)(6) notes.

5 MR. KIM: And it lists Gold Value International  
6 Textile, Inc., a California corporation, individually,  
7 and doing business as Fiesta Fabric, Plaintiff, versus  
8 Zulily, LLC, Wholesale Fashion Square, Inc., Lanesra or  
9 Lanesra, Inc., May & July, Inc., Elad Import, Inc., Li  
10 Yuan Textile and Apparel, Inc., as defendants.

11 For record's purposes, I'm going to be marking  
12 this document as Exhibit 3.

13 BY MR. KIM:

14 Q. Mr. Kremerman, do you see the document that has  
15 been marked as Exhibit 3?

16 A. I do.

17 Q. Have you seen this document before today?

18 A. I don't recall.

19 Q. Do you know a company by the name of Gold Value  
20 International Textile, Inc.?

21 A. I have heard of them, yes.

22 Q. And how do you know that company?

23 A. I know that they produced -- produced textile.

24 Q. And are you familiar with a name Fiesta Fabric?

25 A. I see it here; it says Fiesta Fabric.

1 Q. But are you familiar with that name, besides  
2 what you see on Exhibit 3?

3 A. No, not that I recall.

4 Q. Now, are you familiar with the company called  
5 Zulily, LLC?

6 A. I am, yes.

7 Q. And how are you familiar with that company?

8 A. They're a big company. They do a lot of  
9 advertising.

10 Q. Has WholesaleFashionSquare.com, Inc. done any  
11 business with Zulily, LLC?

12 A. I don't recall.

13 Q. Are you familiar with a company called Lanesra,  
14 Inc.?

15 A. I don't recall.

16 Q. Are you familiar with a company called May &  
17 July, Inc.?

18 A. I remember there was a company called May &  
19 July, Inc.

20 Q. And how do you know that company?

21 A. I know them. They had a store in San Pedro.  
22 They're a big company.

23 Q. Did you do any business with May & July, Inc.?

24 A. Yes, I think I did.

25 Q. And what type of business?

1           **A. I believe I bought merchandise from them.**

2           Q. Do you recall what type of merchandise?

3           **A. Can you -- clothing -- women's clothing.**

4           MR. WAGNER: Continue to object to this as  
5 beyond the scope.

6           Can I ask you, for the record, what the  
7 relevance and where this is within the 30(b)(6) notice?

8           MR. KIM: Yeah. No. Absolutely. We're trying  
9 to get more information as to the conduct in which the  
10 company, WFS, engages in when dealing with or  
11 purchasing garments and how it purchases it, where, and  
12 what relationships. And, essentially, the relationship  
13 as to how it may have committed some infringements in  
14 the past.

15          MR. WAGNER: And which time -- sorry. And  
16 which topic does this fall under?

17          MR. KIM: And to be fair, I don't know what  
18 these complaints were exactly about and what role  
19 Wholesale Fashion Square played. So that's why I  
20 wanted to gather the information.

21          MR. WAGNER: But which topic on the 30(b)(6)  
22 notice is this subsumed in?

23          MR. KIM: Well, several. First off, in  
24 relation to number two.

25          MR. WAGNER: This has nothing to do with the

1     Sherpa jacket.

2             MR. KIM:   Number nine.   Number nine.

3             MR. WAGNER:  I don't think this has anything to  
4     do with --

5             MR. KIM:   Well, that's your opinion.   I beg to  
6     differ.

7             MR. WAGNER:  Well, what relevance --

8             MR. KIM:   Look, I don't think I need to get  
9     into describing why, in terms of the relevance.   If you  
10    have a problem with it, you could instruct your client  
11    not to answer, and we can go about resolving it in  
12    front of the judge, for efficiency sake.

13            MR. WAGNER:  Okay.   No, I think it's well  
14    beyond the scope.

15            We can move on.

16            MR. KIM:   All right.   So are you instructing  
17    your client not to answer as to these lines of  
18    questions?

19            MR. WAGNER:  No, I'm not.   That's your trick,  
20    not mine.

21            MR. KIM:   Okay.

22    BY MR. KIM:

23        Q.   So, Mr. Kremerman, can you please respond to my  
24    latest question regarding your business that you had  
25    with -- I believe we were talking about May & July,

1 Inc.

2 A. Okay. Can I see the document again? It's  
3 gone.

4 MR. WAGNER: Oh, sorry. Let me get it back.

5 THE WITNESS: Yeah, I used to buy merchandise  
6 from them.

7 BY MR. KIM:

8 Q. Okay. And we talked about that you purchased  
9 clothing from them; correct?

10 A. Correct.

11 Q. And what type of clothing did you purchase from  
12 them?

13 A. Merchandise.

14 Q. And when you purchased clothing, or dresses, or  
15 tops from them, did they consist of labels or tags?

16 A. Yes, I would assume so.

17 Q. And do you recall whose tags or labels those  
18 garments had?

19 A. Yeah, it would be -- it would be theirs, May &  
20 July.

21 Q. I'm sorry?

22 A. To the best of my recollection -- recollection,  
23 they have a label.

24 Q. How about Elad Import, Inc.? Are you familiar  
25 with that company?

1           **A. Am I familiar with them? No. I mean -- no.**

2           Q. Are you familiar with a company called Li Yuan  
3 Textile and Apparel, Inc.?

4           **A. No.**

5           Q. Do you recall about this lawsuit, what that was  
6 for?

7           **A. I do not. I do not recall.**

8           Q. Now, I want you to look at Exhibit 4.

9           MR. WAGNER: Mitchell, did you ever end up  
10 marking the website exhibit?

11           MR. KIM: Not the web page where we used it to  
12 give an example about the web design.

13           MR. WAGNER: Okay.

14           MR. KIM: Exhibit 9 --

15           MR. WAGNER: Okay. So that web page one is  
16 supposed to remain unmarked?

17           MR. KIM: Yes.

18           MR. WAGNER: Okay.

19           MR. KIM: Now, for the record, we're sharing  
20 via share screen on Zoom a document that is titled  
21 "Plaintiff's Complaint For, One, Copyright  
22 Infringement; Two, Vicarious Copyright Infringement;  
23 Three, Contributory Copyright Infringement."

24                   (Court reporter clarification.)

25           MR. KIM: Plaintiff listed on the document is



MICHAEL KREMERMAN

September 04, 2020

1 Jitrade, Inc.; defendants listed on the document are En  
2 Coree USA Inc., DBA The Sang Clothing, and Sang Bae  
3 Han; Scott Chongyang Kim; WholesaleFashionSquare.com,  
4 Inc.; Michael Kremerman as defendants.

5 For record's purposes, I'm going to be marking  
6 this as Exhibit 4, for the record.

7 (Exhibit 4 marked.)

8 BY MR. KIM:

9 Q. Mr. Kremerman, have you seen this document that  
10 has been marked as Exhibit 4?

11 MR. WAGNER: I'll continue to object on  
12 relevance and beyond the scope of the 30(b)(6) notice.

13 **THE WITNESS: I don't recall seeing this**  
14 **document. I mean, maybe I did. I don't know. Could**  
15 **be.**

16 BY MR. KIM:

17 Q. Where it lists Michael S. Kremerman, that is  
18 your name; correct?

19 **A. That is my name.**

20 Q. Are you familiar with a company called En Coree  
21 U.S.A., Inc.?

22 **A. Maybe. I'm not sure.**

23 Q. How about the Sang -- The Sang Clothing?

24 **A. I know a company by the name of Sang, yes.**

25 Q. And how do you know that name?

1       **A. I buy merchandise from them.**

2       Q. What kind of merchandise?

3       **A. Clothing.**

4       Q. And what type of clothing?

5       **A. Dresses, tops, whatever they're selling.**

6       Q. Do you recall when the last purchase was made?

7       **A. I do not.**

8       Q. Did you purchase any Sherpa jackets from Sang  
9 Clothing?

10       **A. Might have.**

11       Q. Do you have any invoices to show the purchase  
12 of the Sherpa jackets from The Sang Clothing?

13       **A. I don't know. I'd have to check.**

14       MR. WAGNER: I continue to object as beyond the  
15 scope.

16 BY MR. KIM:

17       Q. And to clarify when I use the phrase, the  
18 "Sherpa jackets," we're talking about the Sherpa  
19 jackets that are defined as infringing garments.

20       MR. WAGNER: Objection; vague.

21 BY MR. KIM:

22       Q. So with that understanding, did you purchase  
23 the Sherpa jackets that are -- that are at issue of  
24 this litigation from a company called The Sang  
25 Clothing?

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1           **A. I don't think -- no, I don't think so.**

2           Q. Did you sell any of the Sherpa jackets that you  
3 purchased from this -- that is at issue in this  
4 litigation to a company called The Sang Clothing?

5           **A. I don't think so.**

6           Q. And when you purchased garments or clothes from  
7 The Sang Clothing, do you recall receiving those  
8 clothes with labels or tags?

9           **A. I wouldn't remember.**

10          Q. Now, I want you to look at Exhibit 5.

11                 For the record, this document is titled  
12 "Plaintiff's First Amended Complaint For, One,  
13 Copyright Infringement; Two, Vicarious Copyright  
14 Infringement; Three, Contributory Copyright  
15 Infringement."

16                 Plaintiff listed is C&SM International, a South  
17 Korea Corporation. Defendants listed are Fashion Eden,  
18 DBA Make Me Chic; John Chang;  
19 WholesaleFashionSquare.com, Inc.; Michael S. Kremerman.

20                 For the record's purposes, I'm going to be  
21 marking this as Exhibit 5.

22                         (Exhibit 5 marked.)

23          BY MR. KIM:

24           Q. Mr. Kremerman, have you seen this document  
25 before today?

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1 MR. WAGNER: Continue to object as beyond the  
2 scope and irrelevant.

3 THE WITNESS: I don't recall seeing this  
4 document. But, again, I might have.

5 BY MR. KIM:

6 Q. And, again, the company,  
7 WholesaleFashionSquare.com, Inc., that is your company;  
8 correct?

9 A. That's not how they wrote it here, but that is  
10 my company.

11 Q. And Michael S. --

12 A. I'm sorry. That is mine, yes.

13 Q. Okay. Now, are you familiar with a company  
14 called C&SM International?

15 A. Yeah, I think I've seen this.

16 Q. And how do you know this company?

17 A. Maybe from this document. Maybe purchased  
18 goods from them. I don't remember.

19 Q. Do you know what they sell?

20 A. Not offhand, no.

21 Q. What, if any -- what --

22 A. I don't know. I think maybe -- I don't know.  
23 I really don't. I'd just be guessing, so no.

24 MR. WAGNER: Yeah, don't guess.

25 MR. KIM: Yeah, don't guess, please.

1           **THE WITNESS: Yeah, I don't know.**

2       BY MR. KIM:

3           Q. What, if any, goods, did you purchase from  
4       C&SM International?

5           **A. I don't recall.**

6           Q. Did you ever purchase the Sherpa jackets that  
7       are at issue in this case from C&SM International?

8           **A. I don't think so.**

9           Q. Did you ever sell the Sherpa jackets that are  
10      at issue in this case to C&SM International?

11          **A. I don't recall.**

12          Q. Are you familiar with a company named  
13      Fashion Eden, DBA Make Me Chic?

14          **A. I don't recall this name.**

15          Q. Are you familiar with the name John Chang?

16          **A. I don't recall.**

17          Q. Now, I want you to look at Exhibit 6 -- or  
18      what's to be marked as Exhibit 6.

19               MR. KIM: For the record's purposes, this  
20      document has the title "Complaint For Copyright  
21      Infringement."

22               The Plaintiff listed is Universal Dyeing &  
23      Printing, Inc.; defendants listed are  
24      WholesaleFashionSquare.com, Inc., and Does 1 through  
25      10.

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1 I'm going to be marking this as Exhibit 6 for  
2 the record.

3 (Exhibit 6 marked.)

4 BY MR. KIM:

5 Q. Mr. Kremerman, have you ever seen this document  
6 that has been marked as Exhibit 6 before today?

7 MR. WAGNER: Continue to object on the same  
8 line as beyond the scope and relevance.

9 **THE WITNESS: I don't recall.**

10 BY MR. KIM:

11 Q. Are you familiar with a company called  
12 Universal Dyeing & Printing?

13 **A. I know they're a clothing company.**

14 Q. Have you purchased any goods from Universal  
15 Dyeing & Printing on behalf of Wholesale Fashion  
16 Square?

17 **A. Not to the best of my recollection.**

18 Q. Have you had any form of business dealing with  
19 Universal Dyeing & Printing on behalf of Wholesale  
20 Fashion Square?

21 MR. WAGNER: Objection; scope; relevance.

22 **THE WITNESS: Can you make it clearer?**

23 MR. KIM: Sure.

24 BY MR. KIM:

25 Q. Has Universal Dyeing & Printing, Inc., for

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1 example, sell any goods to WholesaleFashionSquare.com?

2 **A. I don't recall.**

3 Q. Now, I want you to look at Exhibit 7.

4 **A. Okay.**

5 MR. KIM: For the record, this document is  
6 titled "Plaintiff's Complaint For Copyright  
7 Infringement, Number One; Number Two, Vicarious And/Or  
8 Contributory Copyright Infringement."

9 Plaintiff listed is Unicolors, Inc.; defendants  
10 listed are Moda Xpress, Inc., and  
11 WholesaleFashionSquare.com, Inc.

12 For the record, I'm going to be marking this  
13 document as Exhibit 7.

14 (Exhibit 7 marked.)

15 BY MR. KIM:

16 Q. Mr. Kremerman, have you ever seen this document  
17 before today?

18 MR. WAGNER: Same objection on scope and  
19 relevance.

20 **THE WITNESS: No, I don't recall this document.**

21 BY MR. KIM:

22 Q. Are you familiar with a company called  
23 Moda Xpress, Inc.?

24 **A. No, I am not.**

25 Q. I'm sorry?

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1       **A. No, I don't recall -- I don't remember a**  
2       **company with this name.**

3       Q. Are you familiar with a company called  
4       Unicolors, Inc.?

5       **A. I am not.**

6       Q. Do you recall selling any of the Sherpa jackets  
7       that are at issue for this litigation to Moda Xpress,  
8       Inc.?

9       **A. I don't recall.**

10      Q. Do you recall selling the Sherpa jackets that  
11      are at issue in this litigation to Unicolors, Inc.?

12      **A. I have no recollection -- no, I don't recall.**

13      Q. Now, I want you to look at Exhibit 8 -- or  
14      what's to be marked as Exhibit 8.

15             MR. KIM: For the record, this document is  
16      titled "Plaintiff's Third Amended Complaint For, One,  
17      Copyright Infringement; Two, Vicarious And/Or  
18      Contributory Copyright Infringement."

19             Plaintiff listed is Star Fabrics, Inc. and  
20      defendants listed are Rhapsodielle, Inc. -- I butchered  
21      that -- Classic for Ladies; MJC Connection Inc.; DESE  
22      Enterprise, Inc., DBA AMI Club Wear;  
23      WholesaleFashionSquare.com, Inc.; Joia Trading, Inc.

24             I'm going to be marking this document as  
25      Exhibit 8, for the record.



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1 (Exhibit 8 marked.)

2 BY MR. KIM:

3 Q. Mr. Kremerman, have you seen this document  
4 before today?

5 **A. I don't recall this document.**

6 Q. Are you familiar with a company called  
7 Rhapsodielle, Inc.?

8 **A. No, I'm not.**

9 Q. Are you familiar with a company called Classic  
10 for Ladies?

11 **A. Can you say that again?**

12 Q. Are you familiar with a company called Classic  
13 for Ladies?

14 **A. No, I don't recall.**

15 Q. Are you familiar with a company called MJC  
16 Connection, Inc.?

17 **A. Where is that? No, I do not recall this one.**

18 Q. How about a company called Mind Code?

19 **A. There's a clothing company called Mind Code.**

20 Q. Have you sold the Sherpa jackets that are at  
21 issue here in this case to the company called  
22 Mind Code?

23 **A. You know what, maybe -- I'm sorry, I think I**  
24 **got the wrong -- I think it was Mine Code, not**  
25 **Mind Code, so I don't know this company.**

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1 Q. Okay. So you're not familiar with this company

2 --

3 A. Sorry. I don't think it's that -- I'm not sure  
4 that's the name that I was thinking of.

5 Q. Okay. So Mind Code, you're not familiar with;  
6 correct?

7 A. I think there's a company, but I think it's  
8 called Mine Code. I don't think it's called Mind Code.  
9 I may be wrong. I'm not sure.

10 Q. Yeah, don't guess, please.

11 A. Yeah, I'm not sure.

12 Q. Are you familiar with a company called DESE  
13 Enterprise, Inc.?

14 A. Can you say that again?

15 Q. Sure.

16 Are you familiar with a company called DESE  
17 Enterprise, Inc.?

18 It's actually listed on Exhibit 8.

19 A. Yeah. No, I'm looking at it -- no.

20 Q. Are you familiar with the name AMI Club Wear?

21 A. I know there is a company called AMI Club Wear.  
22 I don't know if they still exist, but there used to be  
23 a company called AMI.

24 Q. Do you recall if Wholesale Fashion Square sold  
25 the subject Sherpa jackets that are at issue in this

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1 litigation to a company called AMI Club Wear?

2 **A. I don't recall.**

3 Q. Are you familiar with a company called Joia  
4 Trading, Inc.?

5 **A. Yes.**

6 Q. How do you know that company?

7 **A. It's a very big company.**

8 Q. What kind of a company is it?

9 **A. They sell accessories.**

10 Q. Do they also sell garments?

11 **A. They sell accessories. They sell shoes. Do**  
12 **they sell garments? I'm not sure. I don't think so,**  
13 **but I'm not sure.**

14 Q. Do you recall selling the Sherpa jackets that  
15 are at issue in this litigation to a company called  
16 Joia Trading, Inc.?

17 **A. I have never sold anything to this company,**  
18 **that I know of.**

19 Q. Are you familiar with a company called  
20 Star Fabrics, Inc.?

21 **A. It's a fabric company.**

22 Q. Did you sell the subject Sherpa jackets that  
23 are at issue in this litigation to Star Fabrics, Inc.,  
24 at any time?

25 **A. Did I? No, I did not.**

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1 Q. Are you familiar with the company called Wear  
2 In LA?

3 MR. WAGNER: Sorry, you cut out.

4 Can you say that again?

5 BY MR. KIM:

6 Q. Are you familiar with a company called  
7 Wear In LA?

8 A. How do -- what kind of where? Like where are  
9 they or what they wear?

10 Q. It's spelled W-e-a-r i-n and LA.

11 A. Not to the best of my recollection.

12 Q. Do you recall if you sold -- you, Wholesale  
13 Fashion Square -- selling the Sherpa jackets that are  
14 at issue in this litigation to a company called Wear In  
15 LA?

16 A. I don't -- I don't know. I have no  
17 recollection, but I wouldn't -- I don't know.

18 MR. KIM: Ania, can you remove this exhibit  
19 from share screen, please?

20 Thank you.

21 BY MR. KIM:

22 Q. Are you familiar with a company called Celli's  
23 Closet?

24 MR. WAGNER: Sorry. You broke up a little  
25 there.

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1 State of California )

2 County of LOS ANGELES )

3

4 Deponent's Declaration

5

6

7

8 I, MICHAEL KREMERMAN, VOLUME I, do hereby certify  
9 under penalty of perjury that I have read the foregoing  
10 transcript of my deposition taken on September 4, 2020;  
11 that I have made such corrections as appear noted on  
12 the Deposition Errata Page, attached hereto, signed by  
13 me; that my testimony as contained herein, as  
14 corrected, is true and correct.

15

16 Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2020,  
17 at \_\_\_\_\_, California.

18

19

20

21 \_\_\_\_\_  
MICHAEL KREMERMAN, VOLUME I

22

23

24

25

MICHAEL KREMERMAN

September 04, 2020

1 State of California )

2 County of LOS ANGELES )

3

4 I, Kathy Mannlein, Certified Shorthand Reporter,  
5 do hereby certify:

6 That prior to being examined, the witness in the  
7 foregoing proceeding was by me duly sworn to testify to  
8 the truth, the whole truth, and nothing but the truth;

9 That said proceedings were taken before me at the  
10 time and place therein set forth and were taken down by  
11 me in shorthand and thereafter transcribed into  
12 typewriting under my direction and supervision;

13 I further certify that I am neither counsel for,  
14 nor related to, any parties to said proceedings, nor in  
15 anywise interested in the outcome thereof.

16 In witness whereof, I have hereunto subscribed my  
17 name.

18

19 Dated: September 20, 2020

20

21

22

  
Kathy Mannlein  
CSR No. 13153

23

24

25